



NOV - 3 2006

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

The Wallace Enterprises, Inc.
DBA Vascular Architects
% Mr. Kevin F. MacDonald
Regulatory Consultant
229 Marvilla Circle
Pacifica, California 94044

Re: K031641
Trade/Device Name: Vascular Architects aSpire[®] Covered Stent and 718[™] Delivery System
Regulation Number: 21 CFR 878.3720
Regulation Name: Tracheal prosthesis
Regulatory Class: II
Product Code: JCT
Dated: May 27, 2003
Received: May 27, 2003

Dear Mr. MacDonald:

This letter corrects our substantially equivalent letter of August 1, 2003.

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set

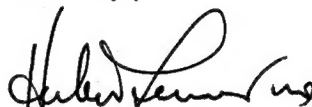
Page 2 – Mr. Kevin F. MacDonald

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to continue marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,



for

Mark N. Melkerson

Director

Division of General, Restorative
and Neurological Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Indications for Use

510(k) Number (if known): K031641

Device Name: Vascular Architects aSpire® Covered Stent and
718™ Delivery System

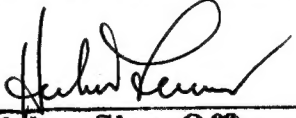
Indications for Use: The Vascular Architects aSpire® Covered Stent and
718™ Delivery System are indicated for use in the
treatment of tracheobronchial strictures produced by
malignant neoplasms.

Prescription Use X OR Over-The-Counter Use

PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER
PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

(Per 21 CFR 801.109)


(Division Sign-Off) (Optional Format 1-2-96)
**Division of General, Restorative,
and Neurological Devices**

510(k) Number K031641

510(k) Summary of Safety and Effectiveness

This summary of 510(k) safety and effectiveness information is being submitted in accordance with the requirements of SMDA 1990 and 21 CFR 807.92.

The assigned 510(k) number is **K031641**.

General Information

Date Amended:	July 28, 2006
Classification	Class II, Tracheal Prosthesis per 21 CFR § 878.3720
Product Code	JCT
Common Name:	Tracheal Stent
Trade Name	Vascular Architects aSpire® Covered Stent and 718™ Delivery System
Submitter	Wallace Enterprises, Inc. DBA Vascular Architects 1650 Elm Hill Pike Nashville, TN 37210
Contact	Kevin F. MacDonald Regulatory Consultant Tel. 415 609 9875

Intended Use

The Vascular Architects aSpire® Covered Stent and 718™ Delivery System are indicated for use in the treatment of tracheobronchial strictures produced by malignant neoplasms.

Predicate Devices

K003173 – Vascular Architects aSpire® Covered Stent and Delivery Catheter
K012544 – Vascular Architects aSpire® Covered Stent and Controlled Expansion® Delivery System
K030567 – Vascular Architects aSpire® Covered Stent and Controlled Expansion® Delivery System – 15cm stent length

Performance Standards

Performance Standards have not yet been established by the FDA under section 514 of the Federal Food, Drug and Cosmetic Act.

Device Description

The Vascular Architects aSpire® Covered Stent is a spiral stent made from Nickel Titanium and fully covered with ePTFE sleeve. The ePTFE is sealed at the proximal and

distal ends completely encapsulating the Nickel Titanium. The 718™ Delivery Catheter is designed to allow the user to expand the stent within the stricture and confirm positioning prior to release.

Comparison To Predicate Device

The Vascular Architects aSpire® Covered Stent shares the same intended use as the predicate device and is identical in mode of action. The materials used in the subject device are similar to those used in the predicate device. The only difference between the subject device and the predicate device is in the length of the stent.

Testing Summary

Simulated use and performance testing was conducted on the Vascular Architects aSpire® Covered Stent and 718™ Delivery System. Results of the bench testing performed demonstrate the mechanical integrity and device performance of the subject device is substantially equivalent to that of the predicate device.

Statement of Substantial Equivalence

The Vascular Architects aSpire® Covered Stent and 718™ Delivery System is substantially equivalent to the legally marketed Vascular Architects aSpire™ Covered Stent size Vascular Architects aSpire® Covered Stent and Controlled Expansion® Delivery System.